

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**THE UNITED STATES OF AMERICA,**

**v.**

**SAINT JOVITE YOUNGBLOOD  
a.k.a. Kota Youngblood,  
Defendant.**

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**CRIMINAL NO. A-23-CR-135-RP**

**GOVERNMENT’S MOTION FOR RECIPROCAL DISCOVERY AND INSPECTION,  
AND REQUEST FOR NOTICE PURSUANT TO FEDERAL RULE OF CRIMINAL  
PROCEDURE 12.2**

The United States of America, by and through the United States Attorney for the Western District of Texas, hereby files this Motion for Reciprocal Discovery and Inspection, Notice of Intended Alibi Defense, and Notice Pursuant to Federal Rule of Criminal Procedure 12.2.

**GOVERNMENT’S MOTION FOR RECIPROCAL DISCOVERY**

Pursuant to Rule 16(b)(1)(A) and (B) of the Federal Rules of Criminal Procedure, the Government requests that the Court order Defendant to identify and provide the Government an opportunity to inspect and to copy or photograph any and all books, papers, documents, data, photographs, tangible objects, or copies or portions thereof, as well as results or reports of physical or mental examinations and of scientific tests or experiments made in connection with the case that are within the possession, custody, or control of the Defendant and which the Defendant intends to use in his case-in-chief at trial.

Furthermore, the United States requests that the Court order Defendant to provide to the Government the identity of, and an expert disclosure for, all experts the Defendant intends to call during his case-in-chief, as required by Fed. R. Crim. P. 16(b)(1)(C). The Government requests that any such disclosures be made no later than March 22, 2024, or a date determined by the Court.

The Government additionally requests that the Court order the Defendant, pursuant to Rule 16(c), to promptly disclose to the Government the existence of any additional evidence or material that is discovered prior to or during trial and is subject to disclosure or inspection under Rule 16(b).

The Government has substantially complied with its discovery obligations under Rule 16(a)(1) of the Federal Rules of Criminal Procedure by making available to the Defendant approximately 889 gigabytes of discovery materials, consisting of over 5,600 files. The Government has conferred with defense counsel and additional disclosures are anticipated soon. Additionally, materials will be made available to Defendant in accordance with the Government's continuing discovery obligations.

To date, the Government has received no discovery materials from Defendant.

**THE GOVERNMENT'S REQUEST FOR NOTICE PURSUANT TO FEDERAL RULE  
OF CRIMINAL PROCEDURE 12.2**

Pursuant to Federal Rule of Criminal Procedure 12.2(a) and (b), the Government requests that Defendant be ordered to notify the United States in writing prior to March 15, 2024, if he intends to assert a defense of insanity at the time of the charged offenses.

Further, if Defendant intends to introduce expert evidence relating to a mental disease or defect or any other mental condition of the defendant bearing on the issue of his guilt, the Government requests that he be ordered to notify an attorney for the government in writing of this

intention and file a copy of the notice with the clerk by March 15, 2024, or a date set by the Court.

*See* Fed. R. Crim. P. 12.2(b).

*Respectfully submitted,*

JAIME ESPARZA  
UNITED STATES ATTORNEY

By:

                    /s/                      
MATT HARDING  
DANIEL D. GUESS  
Assistant United States Attorneys

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Government's Motion has been delivered via electronic delivery on the CM/ECF system on March 1, 2024, to:

Charly Herring  
Jose Gonzalez-Falla  
Attorneys for Defendant Saint Jovite Youngblood

\_\_\_\_\_/s/\_\_\_\_\_  
Matt Harding  
Assistant United States Attorney

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**CRIMINAL NO. A-23-CR-135-RP**

**ORDER**

The Court having considered the Government's Motion for Reciprocal Discovery and Inspection, and Request for Notice Pursuant to Federal Rule of Criminal Procedure 12.2, it is hereby

ORDERED that the Government's motion is GRANTED;

IT IS FURTHER ORDERED that Defendant shall timely identify and provide the Government an opportunity to inspect and to copy or photograph any and all books, papers, documents, data, photographs, tangible objects, or copies or portions thereof, as well as results or reports of physical or mental examinations and of scientific tests or experiments made in connection with the case that are within the possession, custody, or control of the Defendant and which the Defendant intends to use in his case-in-chief at trial;

IT IS FINALLY ORDERED that defense counsel shall provide all expert disclosures to the Government no later than March 22, 2024.

SIGNED this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

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ROBERT L. PITMAN  
UNITED STATES DISTRICT JUDGE